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February 25, 2019

**VIA ECF**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007

Re: Jessica Denson v. Donald J. Trump for President, Inc.  
Docket No. 18-cv-2690 (JMF)

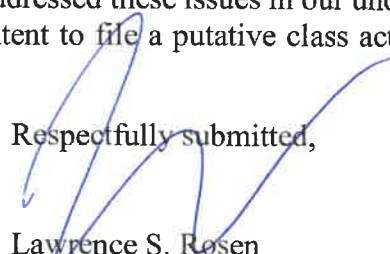
Dear Judge Furman:

We represent defendant Donald J. Trump for President, Inc. (the "Campaign") and write in response to plaintiff's February 22, 2019 letter regarding her recent filing with the American Arbitration Association ("AAA") of a putative class action arbitration against the Campaign. *See* ECF Doc. No. 42.

Currently pending before this Court are (i) the Campaign's motion to confirm the arbitral awards issued by Judge L. Paul Kehoe of the AAA in the prior arbitration the Campaign commenced against plaintiff and (ii) plaintiff's cross-motion to vacate those awards. Respectfully, plaintiff's filing of a new AAA arbitration has no impact on these fully-briefed motions.

Nevertheless, plaintiff's new arbitration filing is significant for its tacit recognition that all issues as to the validity and enforceability of the parties' written agreement are arbitrable as a matter of law, and thus should have been asserted by plaintiff to Judge Kehoe as defenses to the Campaign's claims in the prior arbitration. For reasons best known only to plaintiff, however, she refused to participate in the prior arbitration. We addressed these issues in our underlying motion papers, including the import of plaintiff's stated intent to file a putative class action arbitration. *See* ECF Doc. No. 41 at p. 4, fn. 3.

Respectfully submitted,

  
Lawrence S. Rosen

cc: David K. Bowles, Esq. (via email and ECF)  
Maury Josephson, Esq. (via email and ECF)